

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

NOTORIOUS B.I.G. LLC,  
REPUBLIC MERCHANDISING, INC.,  
and BARRON CLAIBORNE,  
Plaintiffs,

v.

ICANVAS, INC., KROTO, INC.,  
LEON OKS, BEYOND, INC.,  
THE HOME DEPOT, INC.,  
NORDSTROM, INC., AND TARGET CORP.

Defendants.

Case No. 25-cv-01184

Honorable Rebecca R. Pallmeyer  
Honorable Magistrate Judge Jeannice W.  
Appenteng

**DEFENDANTS' FOURTH MOTION FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Defendants ICANVAS, INC., Kroto Inc., Leon Oaks, Beyond, Inc., Nordstrom, Inc., and Target Corp (collectively, “Defendants”), by and through their counsel, Saper Law Offices, LLC, hereby moves the Court for an extension of time to answer or otherwise respond to the Complaint (Dkt. 1) filed by Plaintiffs Notorious B.I.G. LLC, Republic Merchandising, Inc., and Barron Claiborne (collectively, “Plaintiffs”), and in support states as follows:

1. Plaintiffs filed the Complaint on February 4, 2025. According to the summons returned executed filed by Plaintiff, service was effected on all Defendants by February 13, 2025 (Dkts. 13 - 21).
2. On February 28, 2025, Defendant ICANVAS Inc. and Defendant Kroto, Inc. filed an uncontested motion for an extension of time to file an Answer (Dkt. 23).
3. On March 3, 2025, this Court granted Defendants’ uncontested motion and set an April 1, 2025, deadline for a responsive pleading for all Defendants (Dkts. 24 – 25).

4. On March 26, 2025 counsel for Defendant iCanvas and Defendant Kroto, Inc. filed an appearance on behalf of all remaining defendants and filed another uncontested motion for an extension of time to file an Answer or otherwise plead. (Dkts. 27-29).

5. On March 27, 2025, this Court granted Defendants' uncontested motion and set an April 29, 2025, deadline for a responsive pleading for all Defendants (Dkts.30).

6. On April 25, 2025, counsel for Defendant iCanvas and Defendant Kroto, Inc. filed a third motion for an extension of time to file an Answer or otherwise plead. (Dkt. 31).

7. On April 26, 2025, this Court granted Defendants' motion and set a May 27, 2025, deadline for a responsive pleading for the Defendants (Dkt. 32).

8. Defendants, collectively, now respectfully request a fourth 28-day extension for their responsive pleading and to set their response deadlines to June 24, 2025.

9. There is good cause for the requested extension and it is not made for the purpose of delay. The parties have made significant movement towards settlement and are making good faith efforts to resolve their disputes without further judicial intervention, and the extension of time will facilitate those efforts while preserving party and judicial resources.

10. Defendants make this motion while reserving all rights and defenses in the event those efforts are unsuccessful, including but not limited to the right to assert jurisdictional defenses.

11. Defendants have conferred with Plaintiffs' counsel regarding their request for an extension of time and Plaintiffs do not contest this request.

12. This is the fourth request for an extension by either party in this case.

**WHEREFORE**, Defendants respectfully request that the Court grant this motion for extension of time to answer or otherwise respond to the Complaint up to and including June 24, 2025, and for all other relief the Court deems just.

Dated: May 27, 2025

Respectfully submitted,

/s/ Daliah Saper

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